

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:) Case No. 05-15114-WWB
LOVELL PLACE LIMITED)
PARTNERSHIP, AN OHIO LIMITED) Chapter 11
PARTNERSHIP,)
Debtor) Docket No. ____
)
)

SUMMARY OF PLAN DATED NOVEMBER 14, 2008

The keystone of the Plan is the sale of the Lovell Place Asset Package under the jurisdiction of the Bankruptcy Court, free and clear of liens. The goal is to maximize the value of the assets by packaging the real estate and business as one going concern and selling the package to the highest bidder under court-approved bidding procedures.

In order to market and sell the Lovell Place Asset Package, the Debtor must first acquire the real estate from the Decedent's Estate, i.e. the McGarvey Properties. In that regard, National City has or will proceed with State Court Foreclosure Proceedings and Sheriff's Sales, pursuant to which the Debtor will ultimately acquire title to the McGarvey Properties via the Sheriff Deeds, utilizing the Plan Financing provided by National City.

The Class 1 Administrative Claims will be paid in full in the ordinary course of business, at the Sale Closing, or as otherwise ordered by the Court. The Class 2 Real Estate Taxes, the Class 4 Priority Wages and Taxes, the Class 5 amounts, if any, necessary to cure contracts or leases to be assumed by the Debtor and assigned to the purchaser, the Committee Carve-Out and the Decedent's Estate Carve-Out will be paid in full from the proceeds of sale at the Sale Closing. The Class 3 Secured Claims of National City will be paid up to in full from the proceeds of sale, after the Class 1 Administrative Claims, the Class 2 Real Estate Taxes, the Class 4 Priority Taxes and Wages, the Class 5 Claims (for cure) arising from the assumption and

assignment of executory contracts and leases, if any, the Class 6 Committee Carve-Out and the Decedent's Estate Carve-Out have been paid. The Debtor and/or National City may request that the Bankruptcy Court determine what amount(s) are to be paid immediately to the various Classes and what amount(s) shall be held in escrow by the Disbursing Agent pending further Orders of Court.

In exchange for their cooperation and for the releases described therein, the Plan provides that the Decedent's Estate will receive \$55,000 (the Decedent's Estate Carve-Out) and that the General Creditors will receive \$100,000 (the Committee Carve-Out). Based upon the Committee Carve-Out, the pro-rata amount paid on the Effective Date to General Creditors in Class 6 is estimated to be approximately ten (10%) percent.

Respectfully submitted,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.
Attorneys for Debtors

By: /s/ *Guy C. Fustine*
Guy C. Fustine
PA I.D. No. 37543
120 West Tenth Street
Erie, Pennsylvania 16501-1461
(814) 459-2800

#810019